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November 9, 2021

Honorable Vernon S. Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Leftenant v. Blackmon*, 1:21-cv-07846-VSB

Dear Judge Broderick:

Pursuant to Section 6 of the SDNY ECF Rules, Standing order 19-MC-583 as well as this Court's Individual Rules of Practices in Civil Cases, Section 5 (b) (iii), Plaintiffs hereby request that the initial Complaint in this action be sealed and that redacted copy hereof be filed in the form attached hereto as **Exhibit A**. Plaintiffs make this request as there are references in the initial Complaint to an agreement that has been designated as "confidential"¹ and is subject to a Protective Order in another matter pending in the District of Nevada, *See Leftenant v. Blackmon* , 18-cv-01948. A copy of the Protective Order in that action is attached hereto as **Exhibit B**. Plaintiffs make this request in the abundance of caution as while Plaintiffs have not disclosed the body of the agreement, Plaintiffs reference the agreement in the initial Complaint at Paragraphs 16 through 34.

¹ The subject agreement was initially marked as "Attorneys Eyes Only" in the other action and later agreed to be merely a "confidential" document.

Pursuant to Rule 6.1 of SDNY Electronic Case Filing Rules and Instructions documents may not be placed under seal without leave of the Court. Plaintiffs therefore, request to have this Court seal the initial Complaint and that Plaintiffs file a redacted copy of the same with this Court in the form of Exhibit A. Further, as Plaintiffs have not served the Defendants in this action no meet and confer is required at this juncture. Plaintiffs intend to serve Defendants with the redacted initial Complaint and will provide the sealed copy after service.

For the foregoing reasons, Plaintiff respectfully request that this Court grant its motion to seal the initial Complaint.

Dated: November 9, 2021

Respectfully submitted,

/s/ Lita Rosario

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**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 11/10/2021

Plaintiffs are instructed to file the unredacted version with the Clerk and the redacted version on ECF.